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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**  
16 **COMPANY,**

17 **Debtors.**

18 ☐ Affects PG&E Corporation

19 ☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

20 *\* All papers shall be filed in the Lead Case, No.*  
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON  
RESPONSES TO ONE HUNDRED  
ELEVENTH OMNIBUS OBJECTION TO  
CLAIMS AND REQUEST FOR ORDER BY  
DEFAULT AS TO UNOPPOSED  
OBJECTIONS**

**[Re: Dkt. No. 11427]**

**Regarding Objections Set for Hearing  
November 23, 2021, at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the  
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule  
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District  
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*  
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**  
8 **Management Order**”), that the Court enter an order by default on the following omnibus claims  
9 objection (the “**Omnibus Objection**”)<sup>1</sup>:

10

<b>Docket Number</b>	<b>Omnibus Objection</b>
11 11427	<i>Reorganized Debtors’ One Hundred Eleventh Omnibus Objection to Claims (Governmental Unit Combined Claims)</i> (the “ <b>One Hundred Eleventh Omnibus Objection</b> ”)

12

13 **RELIEF REQUESTED IN THE OMNIBUS OBJECTION**

14 The Omnibus Objection seeks to reduce, disallow and/or expunge the Proofs of Claim listed in  
15 Exhibit 1 to the Omnibus Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed a Notice of Hearing with respect to the Omnibus Objection  
18 [Docket No. 11430]. The Omnibus Objection was also supported by the declaration of Robb  
19 McWilliams [Docket No. 11428]. The Omnibus Objection, the Notice of Hearing, and the Declaration  
20 were served as described in the *Certificate of Service of Sonia Akter*, filed on October 21, 2021  
21 [Docket No. 11457], each holder of a claim listed on Exhibit 1 to the Omnibus Objection received a  
22 notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for  
23 Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and/or expunged  
24 or allowed in a reduced amount, and, if applicable (ii) the claim number, claim amount and priority of  
25 the surviving claim for each counterparty.

26 <sup>1</sup> Concurrently with the Omnibus Objection, the Reorganized Debtors filed the *Reorganized Debtors’*  
27 *One Hundred Tenth Omnibus Objection to Claim Nos. 76018 and 78381 (Greenberg Claims)* [Docket  
28 No. 11420]. This omnibus objection has been continued to the omnibus hearing on December 21,  
2021, with respect to all claims therein. See Docket No. 11487.

1 The deadline to file responses or oppositions to the Omnibus Objection has passed. The  
2 Reorganized Debtors did not receive any formal or informal responses.

3 **DECLARATION OF NO OPPOSITION RECEIVED**

4 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

5 1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the  
6 Reorganized Debtors.

7 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no  
8 responses have been filed with respect to the Omnibus Objection except as described herein.

9 3. This declaration was executed in Sunnyvale, California.

10 WHEREFORE, the Reorganized Debtors hereby request entry of an Order (i) disallowing  
11 and/or expunging or (ii) allowing in a reduced amount the Proofs of Claim listed in **Exhibit 1** to this  
12 Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objection.

13  
14 Dated: November 16, 2021

**KELLER BENVENUTTI KIM LLP**

15 By: /s/ Thomas B. Rupp  
16 Thomas B. Rupp

17 *Attorneys for Debtors and Reorganized Debtors*  
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